



INDEPENDENT ASSESSMENT PROTOCOL

VERSION 1.0

March 15, 2004

PERFORMANCE TRACK INDEPENDENT ASSESSMENT PROTOCOL, VERSION 1.0

GUIDE TO Performance Track INDEPENDENT ASSESSMENT PROTOCOL

This Independent Assessment Protocol provides guidance to independent parties conducting EMS assessments at facilities wishing to apply to the National Environmental Performance Track program (Performance Track). This Protocol can be used as a stand-alone document, or it can be incorporated into existing audit protocols. The auditor(s) conducting the assessment must meet the qualifications set out in the Performance Track Independent Assessment criterion (see www.epa.gov/performance-track). In addition, the auditor(s) should have a good working knowledge of all of the Performance Track EMS provisions and be familiar with the other Performance Track entry criteria.

The assessment must cover all of the activities, products, and services within the scope of the “facility” wishing to seek entry into Performance Track. Note that, for purposes of Performance Track, a facility may actually comprise buildings, properties, activities, and services that are not co-located on a contiguous parcel of land. The auditor(s) should ascertain the boundaries of the facility – both physical and functional – prior to conducting the assessment. Any questions regarding the acceptability of a particular facility in this sense should be directed to the Performance Track hotline at ptrack@indecon.com or 888-339-PTRK (7875).

This Protocol is organized into the following major evaluation areas:

Section I: EMS Evaluation

- Overall EMS
- Policy
- Planning
- Implementation and Operation
- Checking and Corrective Action
- Management Review

Section II: Top Facility Management Commitment

Section III: Public Outreach

[Public outreach is one of the four Performance Track entry criteria and is included in this assessment protocol because this function is usually integrated into an organization’s EMS.]

Following the evaluation sections is a Summary Form that can be used to summarize the auditor(s) findings. Each evaluation topic area contains one or more assessment criteria that must be assessed. Criteria can be assessed as either:

Yes	Conformance. The facility has fully addressed the criterion.
No – Minor	Minor non-conformance. The facility has addressed or marginally addressed the criterion, but still has some discrepancies that could be corrected with minimal organizational, operational, or technical change and within a reasonable time frame.
No – Major	Major non-conformance. The facility has not addressed or adequately addressed the criterion.

Facilities with minor non-conformances may be accepted into Performance Track if: a) EPA determines that the non-conformances taken as a whole do not compromise the effectiveness of the facility’s overall

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EMS, and b) there is an acceptable corrective action schedule in place to address the deficiencies. Facilities with major non-conformances generally will not be eligible for entry into Performance Track until those deficiencies are corrected. Contact the Performance Track hotline for any questions on this topic.

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OVERALL EMS

1. SCOPE			
✓ Does the EMS cover the entire physical area of the facility and all activities including any ancillary operations such as warehouses, power generation facilities, waste management facilities, offices, R&D facilities, other company divisions or product lines onsite, and contractors operating onsite?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

2. CHANGE MANAGEMENT			
✓ Does the facility consider the impacts of changes (e.g., management, budget, staffing, regulatory, product design, and equipment) on the effectiveness of its EMS and revise it as necessary?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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3. FULL IMPLEMENTATION CYCLE			
✓ Has the facility's EMS been in place for one complete Plan-Do-Check-Act cycle (including an internal EMS audit, top management review, and any necessary corrective actions)?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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POLICY

4. ENVIRONMENTAL POLICY			
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✓ Does the environmental policy contain a commitment to compliance with legal and other requirements?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the environmental policy contain a commitment to pollution prevention?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the environmental policy contain a commitment to continuous improvement?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the environmental policy contain a commitment to sharing environmental performance information with the community? <i>NOTE: if not in policy, facility may have a separate public outreach procedure or functional program in-place.</i>	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Is the environmental policy communicated internally and externally? [Auditor should interview appropriate/representative employees to determine whether the policy has been adequately communicated.]	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>

Comments:

PLANNING

5. LEGAL AND OTHER REQUIREMENTS

✓ Does the facility effectively identify and access its legal and other requirements?

YES

NO -
MINOR

NO -
MAJOR

Comments:

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6. ENVIRONMENTAL ASPECTS			
✓ Are regular environmental aspects analyses conducted?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Is the facility's entire environmental footprint considered, including any ancillary operations (e.g., warehouses, power generation facilities, offices, R&D facilities), sister divisions onsite, and contractors operating onsite?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the facility have a system for ranking aspects to determine their significance?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are regulatory requirements, community concerns, and the aspects' potential harm to the environment considered when identifying and ranking aspects?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are the aspects kept up to date as changes occur at the facility and in the community and as legal requirements change?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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7. OBJECTIVES AND TARGETS			
✓ Are meaningful and measurable objectives and targets set?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are significant aspects addressed in the objectives and targets?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

8. ENVIRONMENTAL MANAGEMENT PROGRAMS			
✓ Are the facility's environmental management programs actively and effectively meeting their objectives and targets?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are objectives and targets supported by the means to achieve them?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

IMPLEMENTATION AND OPERATION

9. STRUCTURE AND RESPONSIBILITY			
✓ Have responsibilities and authorities for <u>managing and improving</u> environmental performance been well defined?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Have responsibilities and authorities for <u>ensuring compliance</u> with legal and other requirements been well defined?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Have responsibilities and authorities for <u>public outreach and communication</u> of environmental performance been well defined?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments: 			

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10. TRAINING, AWARENESS, AND COMPETENCE			
✓ Has the organization identified training needs and have all appropriate personnel received the necessary training?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are the facility's employees aware of their roles and responsibilities within the EMS and capable of carrying them out?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are those responsible <u>competent</u> to conduct their assigned roles and are they given <u>the necessary time and resources</u>?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

11. COMMUNICATION			
✓ Does the facility effectively communicate its environmental and EMS information internally and externally?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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12. EMS DOCUMENTATION			
✓ Is the environmental policy adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are the significant environmental aspects adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are objectives and targets adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are roles, responsibilities, and authorities adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Is the compliance audit program adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Are the emergency preparedness and response procedures adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Is the EMS audit program adequately documented?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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13. DOCUMENT CONTROL AND RECORDS			
✓ Does the facility have adequate document control and records retention systems to define and control its EMS?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

14. OPERATIONAL CONTROL			
✓ Does the facility have adequate operational procedures to ensure that equipment and other operations comply with legal requirements and address the facility's significant environmental aspects?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the facility define and communicate its procedures to ensure that activities are carried out under specified conditions that address significant environmental aspects and legal compliance?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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18. CORRECTIVE AND PREVENTATIVE ACTION			
✓ Does the facility have adequate procedures for investigating, correcting, and preventing nonconformance?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

MANAGEMENT REVIEW

19. MANAGEMENT REVIEW			
✓ Does the facility's top management review, at defined intervals, the effectiveness of its EMSs and are the findings of the review documented and addressed?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

INTERVIEW WITH TOP MANAGEMENT

1. MANAGEMENT INVOLVEMENT IN ENVIRONMENTAL POLICY

Describe your involvement in the development and communication of your facility's environmental policy. How do you use the policy to guide decision-making at your facility?

Comments:

2. MANAGEMENT ROLE IN EMS

Discuss your role in managing environmental issues and discuss how you use the facility's EMS to improve environmental performance.

Comments:

3. MANAGEMENT ATTENTION TO EMS EFFECTIVENESS

How do you as a senior facility manager determine the effectiveness of your facility's EMS?

Comments:

4. MANAGEMENT EXPECTATIONS FOR PERFORMANCE TRACK PARTICIPATION

**What do you see as the primary benefits of participating in Performance Track?
What can EPA and/or the State do to improve the value of your participation in the program?**

Comments:

PUBLIC OUTREACH & PERFORMANCE REPORTING

1. Describe how your facility identifies and responds to community concerns.

✓ Is the facility taking appropriate steps to identify and respond to community concerns?	YES <input type="checkbox"/>	NO – MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
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Comments:

2. Describe your facility’s process for informing the community of important matters that affect them.

✓ Does the facility adequately inform the community of important environmental matters?	YES <input type="checkbox"/>	NO – MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
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Comments:

3. Describe your facility's process for reporting its environmental performance to the public, including the Performance Track Annual Performance Report.			
✓ Is the facility's approach to reporting performance information to the community appropriate to its scale of operations and setting?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
✓ Does the facility make its Performance Track Annual Performance Report (APR) available to the community?	YES <input type="checkbox"/>	NO - MINOR <input type="checkbox"/>	NO - MAJOR <input type="checkbox"/>
Comments:			

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